

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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BANK OF COMMUNICATIONS,
NEW YORK BRANCH,

Case No. 07 CV 4628

Plaintiffs,

**NOTICE OF MOTION FOR
SANCTIONS**

- against -

OCEAN DEVELOPMENT AMERICA, INC.,
HONGMING LI a/k/a MICHAEL LI and
XIAOMING ZHANG

Defendants.
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TO: Law Offices of Bing Li, LLC
1350 Broadway, Suite 1001
New York, New York 10018-0947

Daniel P. Levitt, Esq.
145 Griffen Avenue
Scarsdale, New York 10583

Ocean Development America, Inc. (pro se)
13453A Brooks Drive
Baldwin Park, California 91706

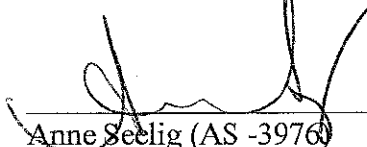
Upon the accompanying Affirmation of Anne Seelig dated August 20, 2008 and the Affidavit of Hong Tu sworn to August 20, 2008, in support of Plaintiff's Motion for Sanctions, Plaintiff, Bank of Communications, New York Branch, will move this Court, before the Honorable Thomas P. Griesa, in Courtroom 26B of the United States Courthouse, 500 Pearl Street, New York, New York on October 2, 2008 at 9:30 A.M., for the entry of an Order, pursuant to Fed. R. Civ. P. 16 and 37:

- (1) Ordering Defendants Hongming Li a/k/a Michael Li and Xiaoming Zhang to pay all attorneys fees and costs from the commencement of this action to date, including efforts made in connection with this motion; and

(2) For such other and further relief that the Court deems just and proper.

Dated: New York, New York
August 20, 2008

Respectfully Submitted,

A handwritten signature in black ink, appearing to read 'Anne Seelig', is written over a horizontal line.

Anne Seelig (AS -3976)

WU & KAO

Attorneys for Plaintiff

747 Third Avenue, 22nd Floor

New York, New York 10017

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